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6 Attorneys for Plaintiff
MARKEL INSURANCE COMPANY
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 MARKEL INSURANCE COMPANY,
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12 Plaintiff,
13

14 v.

15 ROBERT C. GRAHAM, LTD. dba LAWYERS
16 WEST dba ROBERT GRAHAM &
17 ASSOCIATES; ROBERT C. GRAHAM, an
individual; DELWYN WEBBER, an individual;
MICHELE CHAMBERS, an individual;
WILLIAM ELLISON, an individual;
AUDREY GALLOWAY, an individual;
OLESYA SIDORKINA, an individual,
18

19 Defendants.
20

Case No.: 2:17-cv-00975-RFB-GWF

STIPULATION FOR DISMISSAL OF AUDREY
GALLOWAY WITHOUT PREJUDICE

21 IT IS HEREBY STIPULATED by and between Plaintiff Markel Insurance Company ("MIC") and
22 Defendant Audrey Galloway ("Galloway") (collectively the "Parties") that the Complaint be dismissed
23 without prejudice as to Defendant Audrey Galloway only, as follows:

STIPULATION

24 A. MIC recently filed a Complaint seeking rescission and declaratory relief in this Court with respect
25 to a Lawyers Professional Liability Insurance Policy (the "Policy") issued to Defendant Robert C.
26 Graham, Ltd. dba Lawyers West dba Robert Graham & Associates ("Lawyers West"). Galloway
27 was listed in the Policy as a lawyer in the Lawyers West firm. MIC believed that, as such, she
28 could have potentially sought benefits under the Policy if a claim was made against her and thus

1 may have had an interest in whether the Policy was rescinded. As such, MIC included her as a
2 defendant in this case.

3 B. After being served with the Complaint, Galloway contacted MIC counsel and represented that she
4 had previously been a non-partner lawyer in the Colorado office of Lawyers West, did not have
5 contact with the firm's Nevada clients, would not seek benefits under the Policy under any
6 circumstances and as such did not have any interest in or wish to be involved in the case.

7 C. In consideration of Galloway's representations, MIC agreed to dismiss her from the action.

8 D. Based on the foregoing, the Parties stipulate that Galloway is barred from seeking benefits under
9 the Policy and will be dismissed from the case without prejudice.

10 F. Defendant Galloway has made no initial appearance in this case to date.

11 G. Pursuant to this stipulation, the Parties will bear their own attorneys' fees and costs. A voluntary
12 dismissal of the Complaint against Galloway only will be filed upon approval of this stipulation.

13 DATED this 3 day of May, 2017.

14 MORRIS POLICH & PURDY LLP

AUDREY GALLOWAY

15
16
17 By: 

NICHOLAS M. WIECZOREK

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Attorney for Plaintiff

By: 

AUDREY GALLOWAY

23
24 ORDER

25 IT IS SO ORDERED.

26 
27 RICHARD F. BOULWARE, II
28 United States District Judge

DATED this 5th day of May, 2017.